

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Bridgette D. Waites**

**Debtor(s)**

**Government Loan securitization Trust 2011-FV1,  
U.S. Bank Trust National Association, not in its  
individual capacity but solely as Delaware trustee  
and U.S. bank National Association, not individual  
capacity but solely as Co-Trustee**

**Movant**

**vs.**

**Bridgette D. Waites**

**Respondent(s)**

**BK NO. 19-17148 ELF**

**Chapter 13**

**Hearing Date: 02/04/20**

**OBJECTION OF GOVERNMENT LOAN SECURITIZATION TRUST 2011-FV1, U.S.  
BANK TRUST NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY  
BUT SOLELY AS DELAWARE TRUSTEE AND U.S. BANK NATIONAL  
ASSOCIATION, NOT INDIVIDUAL CAPACITY BUT SOLELY AS CO-TRUSTEE  
TO CONFIRMATION OF CHAPTER 13 PLAN**

Government Loan securitization Trust 2011-FV1, U.S. Bank Trust National Association, not in its individual capacity but solely as Delaware trustee and U.S. bank National Association, not individual capacity but solely as Co-Trustee (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. The claims bar date is January 22, 2020. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$63,618.91.
2. Debtor's Plan provides for payment in the amount of \$57,234.24 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$6,384.67, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Government Loan securitization Trust 2011-FV1, U.S. Bank Trust National Association, not in its individual capacity but solely as Delaware trustee and U.S. bank National Association, not individual capacity but solely as Co-Trustee, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: January 9, 2020

By: /s/ Rebecca A. Solarz, Esquire

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